

**American Lung Association of California  
Bluewater Network/Friends of the Earth  
Center for Energy Efficiency and Renewable Technologies  
Coalition for Clean Air  
Community Environmental Council  
Sierra Club California  
Union of Concerned Scientists**

May 7, 2007

Hon. Robert Sawyer, Ph.D.  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95818

Dear Chairman Sawyer:

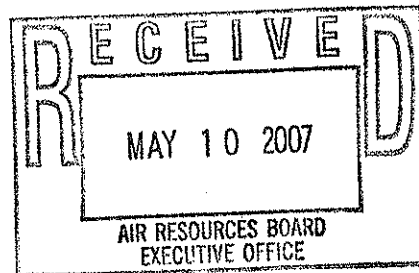
**Re: Early Action Measures -- Transportation Fuels and Light Duty Vehicles**

The state has made tremendous strides in the short time since California's Global Warming Solutions Act, AB 32, was signed into law. The California Air Resources Board (CARB) and Energy Commission (CEC) have committed to a number of actions to reduce global warming pollution from the single largest source – light duty vehicles. Now the challenge facing the state is to develop and implement these vanguard regulations expeditiously while ensuring the regulations protect public health and the environment.

We strongly support CARB's adoption of a low-carbon fuel standard with appropriate safeguards for public health and the environment. We also recommend that CARB consider an alternative fuel vehicle sales requirement to support a market for low carbon fuels. We support CARB's inclusion of a hydrofluorocarbon (HFC) control measure and CEC's adoption of a tire efficiency law that includes a timeline for regulatory development. Below we present more detail on our comments and recommendations.

**Low Carbon Fuel Standard and Alternative-fuel Vehicle Sales Requirement**

The low carbon fuel standard is groundbreaking policy that will, for the first time, hold the fuels industry responsible for global warming pollution in the fuels it sells. The standard should reduce the carbon intensity of gasoline by at least ten percent by 2020, ensure no backsliding in air quality, protect against toxic hot spots, and promote sustainable fuel production. We also recommend that CARB explore including diesel in the standard and an alternative fuel vehicle sales requirement.



Performance based and fuel neutral, the standard will stimulate a market for low carbon alternatives, and could help advance petroleum alternatives such as ethanol, hydrogen, and electricity. The standard will foster investment in very low carbon fuels, such as cellulosic ethanol, with the potential to radically cut global warming pollution by 85 percent or more.

The low carbon fuel standard poses significant but surmountable challenges. The process must rely upon best available data for carbon accounting. CARB will need to collaborate with CEC and other agencies to develop processes for tracking upstream emissions, with periodic updates as our understanding of carbon flows improves. CARB will also need to ensure that California's air quality is protected with strict prohibitions on air quality backsliding and toxic hot spots. In addition, the state will need safeguards in place to promote sustainable fuel production. We look forward to working with CARB to implement a low carbon fuel standard that will simultaneously promote climate stabilization, air quality, and environmental protection.

#### **Hydrofluorocarbon Reduction**

We support CARB's adoption of a measure to ban the sale of HFCs in small cans. We urge CARB to continue to explore whether California can initiate other HFC measures, such as those identified in the Climate Action Team report (requiring use of low global-warming-potential (GWP) refrigerants in new vehicular systems; adopting specifications for commercial refrigeration; requiring refrigerant leak tightness on mobile air conditioners and some types of commercial refrigerators and air conditioners; and enforcing the EPA-required HFC recovery during service and repair).

#### **Fuel-Efficient Tires**

We strongly support CEC's inclusion of a fuel-efficient tire measure as an early action commitment to the Climate Action Team (CAT). CEC's commitment is consistent with the state's landmark tire efficiency law established by AB 844 (Nation, 2003), currently behind schedule for meeting legislatively imposed deadlines. We recognize that CEC is breaking new ground in regulating tire efficiency, which could simultaneously save consumers money at the pump and reduce global warming pollution. We urge the CEC to establish timelines for key milestones of regulatory development, such as workshops, data collection, passage of final standards, and implementation of the standards.

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We appreciate your careful consideration of our suggestions, and look forward to working with you on the early action plan and other AB 32 implementation measures.

Sincerely,

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Union of Concerned Scientists

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American Lung Association of California

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